

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MAGTEN ASSET MANAGEMENT CORP. :
and LAW DEBENTURE TRUST COMPANY OF :
NEW YORK, :

Plaintiffs,

V.

NORTHWESTERN CORPORATION,

Defendant.

Civil Action No. 04-1494-JJF

(Re: D.I. 94)

MAGTEN ASSET MANAGEMENT CORP.,

Plaintiff,

v.

MIKE J. HANSON and ERNIE J. KINDT,

Defendants.

Civil Action No. 05-499-JJF

(Re: D.I. 121)

**JOINT MOTION OF PLAINTIFFS MAGTEN ASSET
MANAGEMENT CORPORATION AND LAW DEBENTURE TRUST
COMPANY OF NEW YORK TO AMEND THE SCHEDULING ORDER**

Plaintiff Magten Asset Management Corporation and the Law Debenture Trust Company of New York, by and through their undersigned counsel, respectfully move to amend the Scheduling Order entered in these cases (D.I. 94 in Case 04-1494; and D.I. 121 in Case 05-499) which provides for consolidated discovery. As discussed in further detail in Plaintiffs' Memorandum of Law filed concurrently herewith, Plaintiffs seek to (i) amend the date for completion of discovery to permit the taking of four (4) depositions of non-party witnesses which could not, as a practical matter, be completed before May 2; and (ii) permit Plaintiffs to take to 14 total depositions, an increase of four (4) depositions over the amount currently permitted under the Scheduling Orders.

Plaintiffs' certification pursuant to Delaware Local Rule 7.1.1 is attached hereto at Tab A,
and a proposed form of order is respectfully attached hereto at Tab B.

Respectfully submitted,

Dated: Wilmington, Delaware
May 2, 2007

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Counsel for Law Debenture Trust
Company of New York

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 2007, I served by hand delivery and electronic filing the JOINT MOTION OF PLAINTIFFS MAGTEN ASSET MANAGEMENT CORPORATION AND LAW DEBENTURE TRUST COMPANY OF NEW YORK TO AMEND THE SCHEDULING ORDER, using CM/ECF which will send notification of such filing(s) to the following:

BY EMAIL AND HAND DELIVERY

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I also certify that, on this 2nd day of May, 2007, I served the aforementioned document, by e-mail and Federal Express, upon the following participants:

BY EMAIL AND FEDERAL EXPRESS

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